

Exhibit A

**UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK**

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	:	Chapter 15
In re:	:	
	:	Case No. 18-11094 (SCC)
PERFORADORA ORO NEGRO, S. DE R.L.	:	(Jointly Administered)
DE C.V., <i>et al.</i> ,	:	
	:	
Debtors in a Foreign Proceeding.	:	
	:	
-----	X	
GONZALO GIL-WHITE, PERSONALLY	:	Adv. Pro. No. 19-01294
AND IN HIS CAPACITY AS FOREIGN	:	
REPRESENTATIVE OF PERFORADORA	:	
ORO NEGRO, S. DE R.L. DE C.V. AND	:	
INTEGRADORA DE SERVICIOS	:	
PETROLEROS ORO NEGRO, S.A.P.I. DE	:	
C.V.,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
ALP ERCIL, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----	X	

**[PROPOSED] ORDER GRANTING JOHN FREDRIKSEN’S
 MOTION FOR LEAVE TO FILE UNDER SEAL**

Upon consideration of the motion (the “Motion to Seal”) of Defendant John Fredriksen (“Fredriksen”) for entry of an order granting permission to file under seal unredacted copies of John Fredriksen’s Memorandum of Law in Support of His Motion to Dismiss the Complaint With Prejudice (the “Motion to Dismiss”); and the Court having jurisdiction to consider the Motion to Seal and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and the Court having found that the legal and factual bases set forth in the Motion to Seal establish just

cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore; it is HEREBY ORDERED THAT:

1. The Motion to Seal is GRANTED to the extent set forth therein.
2. Pursuant to 11 U.S.C. § 107(b), Rule 9018 of the Federal Rules of Bankruptcy Procedure, and Local Bankruptcy Rule 9018-1(b), Fredriksen is authorized to file the Motion to Dismiss under seal.
3. The information in the unredacted copies of the Motion to Dismiss shall remain under seal and shall not be made available to anyone until such time as the Court may direct, except that copies shall be provided to (a) the Court, (b) the Office of the United States Trustee, (c) Plaintiff, and (d) other interested parties, in the discretion of the Producing Parties (as defined in the Protective Order), subject to an appropriate nondisclosure agreement.
4. Any party in interest seeking access to the unredacted copies of the Motion to Dismiss shall file an appropriate motion with the Court seeking such relief on appropriate notice.
5. This Order is without prejudice to the rights of any party in interest, or the United States Trustee, to seek to unseal the Motion to Dismiss or any part thereof.
6. At the conclusion of this Chapter 15 Proceeding, Fredriksen shall unseal or dispose of the confidential information governed by this Order.
7. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

Dated: _____
New York, New York

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE